

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

CHRISTMAS TREE SHOPS, LLC, *et al.*,¹

Debtors.

Chapter 7

Case No. 23-10576 (TMH)

(Jointly Administered)

GEORGE L. MILLER, in his capacity as Chapter 7 Trustee of CHRISTMAS TREE SHOPS, LLC *et al.*,

Plaintiff,

vs.

THE COMMERCIAL TRAFFIC COMPANY
dba CT LOGISTICS,

Defendant.

Adv. Proc. No. 25-50877 (TMH)

**CERTIFICATION OF COUNSEL REQUESTING ENTRY OF ORDER APPROVING
STIPULATION FOR FURTHER EXTENSION OF TIME FOR DEFENDANT TO
ANSWER, MOVE OR OTHERWISE RESPOND TO THE COMPLAINT**

The undersigned hereby certifies as follows:

1. On August 16, 2023, George L. Miller, was appointed as the chapter 7 trustee (the “Trustee”) of the Debtors’ bankruptcy estates. On May 5, 2025, the Trustee filed the *Complaint for Avoidance and Recovery of Preferential Transfers Pursuant to 11 U.S.C. §§ 547 & 550* (the “Complaint”) with the U.S. Bankruptcy Court for the District of Delaware (the “Court”) against

¹ The Debtors in these chapter 7 cases and the last four digits of each Debtor’s U.S. tax identification number are as follows: Christmas Tree Shops, LLC (1207), Handil, LLC (1150), Handil Holdings, LLC (2891), Salkovitz Family Trust 2, LLC (8773), and Nantucket Distributing Co., LLC (1640).

defendant The Commercial Traffic Company dba CT Logistics (the “Defendant” together with Plaintiff, the “Parties”).

2. On or about May 23, 2025, the Plaintiff served the Defendant with a copy of the First Amended Complaint and Summons [Adv. Docket No. 3].

3. Pursuant to Fed. R. Bankr. P. 7012, the Defendant’s response to the Complaint is due on or before June 24, 2025, which has since been extended to September 12, 2025 and then to October 3, 2025.

4. The Parties have agreed and entered into a stipulation, subject to this Court’s approval, to further extend the Defendant’s time to answer, move or otherwise respond to the Plaintiff’s Complaint. Attached hereto as Exhibit A is a proposed form of order approving the stipulation. The stipulation is attached as Exhibit 1 to the proposed form of order.

5. Accordingly, the Parties request that this Court enter the proposed form of order.

Dated: October 10, 2025

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Peter J. Keane

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